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**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

VICTOR R. COTTON, : No. 1:CV-00-1709
Plaintiff, :

Judge Kane

vs.

THREE RIVERS HEALTH PLANS, :
INC., a corporation, :
Defendant. :

FILED
HARRISBURG, PA

FEB 25 2002

MARY E. ANDREA, CLERK
Per *[Signature]* Deputy Clerk

DEFENDANT'S PROPOSED VOIR DIRE QUESTIONS

1. Have any of you ever been plaintiffs or defendants in a lawsuit?¹
2. If so, what was your role, what was the case about and what was the result?
3. Have any of your family members ever been plaintiffs or defendants in a lawsuit?
4. If so, what was their role, what was the case about and what was the result?
5. Have any of you ever had a disagreement with an insurance company or a health maintenance organization?
6. If so, what was the nature of the disagreement and how was it resolved?
7. Have any of your family members or close friends ever had disagreements with an insurance company or a health maintenance organization?
8. If so, what was the nature of the disagreement and how was it resolved?
9. Have any of you ever left a job involuntarily?
10. If so, what were the circumstances?
11. If so, did you file any sort of claim against the employer?
12. Are any members of your immediate families or close friends employed in the medical field?
13. If so, in what capacity and for how long?
14. Have any of you seen a movie that was just released to the theaters called "John Q"?

¹ Because the Court indicated during the pretrial conference that it routinely asks questions about prospective jurors' familiarity with the case, the parties or counsel, these suggested *voir dire* questions focus on other matters.

15. If so, did it affect your impression of health-care insurers? [Three Rivers respectfully suggests that, if any prospective juror indicates that he has seen the film, the foregoing question be posed at sidebar so as to avoid tainting other prospective jurors. In addition, Three Rivers requests that, at the conclusion of each day of the trial, the Court instruct the jury generally not to see any motion pictures during the trial.]

KIRKPATRICK & LOCKHART LLP



Mark A. Rush
David R. Fine
240 North Third Street
Harrisburg, PA 17101
(717) 231-4500

Counsel for Defendant

February 25, 2002

CERTIFICATE OF SERVICE

I hereby certify that, on February 25, 2002, I served a true and correct copy of the foregoing brief on the following by first-class United States Mail, postage-prepaid:

William E. Haggerty, Esq.
240 North Duke Street
Lancaster, PA 17602



David R. Fine